

# **EXHIBIT E**

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*Attorneys for Defendants*

*RIMINI STREET, INC. and SETH RAVIN*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;  
ORACLE AMERICA, INC., a Delaware  
corporation; and ORACLE INTERNATIONAL  
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DEFENDANT RIMINI STREET INC.'S  
RESPONSE TO PLAINTIFF ORACLE  
USA, INC., AMERICA, INC., AND  
ORACLE INTERNATIONAL  
CORPORATION'S FIFTH SET OF  
INTERROGATORIES TO  
DEFENDANT RIMINI STREET, INC.**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Rimini Street, Inc. ("Rimini Street") provides the following responses to Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp.'s ("Oracle" or "Plaintiff") Fifth Set of Interrogatories.

1 used to build those environments. These exhibits include the VM Name for each listed environment  
2 in their second columns, along with the associated client in their first columns. [Additionally,  
3 Exhibits 1A, 1B and 1C indicate the Build Source of the environment in their third columns,  
4 including whether the environment was built directly from client media or whether the environment  
5 was built from other media; and, if the latter, these exhibits indicate the media source in their third  
6 column.] Also see documents spanning Bates-range RSI02971994-2158, which are Build Requests  
7 for environments.

8 **INTERROGATORY NO. 24:**

9 Identify every copy of any Software and Support Material that is or has at any time been  
10 stored at each Non-Customer Location, and the Non-Customer location where it was stored. If any  
11 Non-Customer Locations have existed for which you cannot identify any particular Software and  
12 Support Material stored at that location, Identify each such Non-Customer Location.

13 **ANSWER:**

14 Rimini Street objects to this Interrogatory as overly broad and unduly burdensome to the  
15 extent it seeks information for “any” materials that “is or has at any time” stored in the various  
16 identified locations. Rimini Street objects to this interrogatory to the extent it seeks information that  
17 is not within the possession, custody, or control of Rimini Street. Rimini Street objects to the term  
18 “Non-Customer Location,” and Oracle’s definition of this term, as vague, ambiguous, overbroad and  
19 unduly burdensome. Accordingly, and without conceding that Oracle’s Specified Locations meet  
20 Oracle’s definition of Non-Customer Locations, Rimini will provide an answer for the Oracle  
21 Specified Locations. Rimini Street further objects to this interrogatory on the grounds that it would  
22 require Rimini Street to create a compilation, abstract, or summary from documents that Rimini  
23 Street has produced or will produce to Plaintiffs.

24 Subject to and without waiver of the foregoing general and specific objections, Rimini Street  
25 responds as follows:  
26  
27  
28



1 Rimini responds that, pursuant to Federal Rule of Civil Procedure 33(d), Rimini has  
2 produced and/or will produce documents from which the answer to this Interrogatory can be  
3 ascertained, including but not limited to the following:

4 Exhibit 3, which lists Bates-numbers for documents regarding the Oracle Specified  
5 Locations. More specifically, the documents identified by Exhibit 3 indicate the contents of the  
6 Oracle Specified Locations, as well as use of such information.

7 **INTERROGATORY NO. 25:**

8 For every copy of Software and Support Materials identified in your Response to  
9 Interrogatory No. 24, describe each instance in which the copy of Software and Support Materials  
10 was copied or used for a customer other than the specific customer, if any, from which or on whose  
11 behalf You claim to have obtained the Software and Support Materials that was copied or used. If  
12 you do not claim to have obtained a copy of Software and Support Materials indentified in your  
13 Response to Interrogatory No. 24 from or on behalf of a specific customer, describe each instance in  
14 which that copy of Software and Support Materials was copied or used.

15 **ANSWER:**

16 Rimini Street objects to this Interrogatory as overly broad and unduly burdensome. Rimini  
17 Street objects to this interrogatory to the extent it seeks information that is not within the possession,  
18 custody, or control of Rimini Street. Rimini Street objects to the phrases "Non-Customer Location,"  
19 and "used for a customer other than the specific customer" on the grounds and to the extent they are  
20 vague and ambiguous. Rimini Street further objects to this interrogatory on the grounds that it  
21 would require Rimini Street to create a compilation, abstract, or summary from documents that  
22 Rimini Street has produced or will produce to Plaintiffs.

23 Subject to and without waiver of the foregoing general and specific objections, Rimini Street  
24 responds as follows:

25 Rimini further responds that, pursuant to Federal Rule of Civil Procedure 33(d), Rimini has  
26 produced and/or will produce documents from which the answer to this Interrogatory can be  
27 ascertained, including but not limited to the following:

1 Exhibit 3, which lists Bates-numbers for documents regarding the Oracle Specified  
2 Locations. More specifically, the documents identified by Exhibit 3 indicate the contents of the  
3 Oracle Specified Locations, as well as use of such information.

4  
5 Dated: July 11, 2011

6 */s/ Robert H. Reckers*

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## Exhibit 3

Production Begin Bates
RSI01967188
RSI01990917
RSI03778226
RSI02370530
RSI03780284
RSI02267140
RSI03618848
RSI03625719
RSI03781945
RSI03776772
RSI00830028
RSI00909927
RSI00493472
RSI00493074
RSI02062462
RSI00493439
RSI00449593
RSI03778138
RSI00493467
RSI02348686
RSI03616362
RSI03911315
RSI03777584
RSI03781320
RSI00810828
RSI00829645
RSI00493568
RSI00907672
RSI00906268
RSI00494535
RSI02038741
RSI02126697
RSI03619435
RSI00464924
RSI03878094
RSI02065423
RSI00478276
RSI03780337
RSI03783294
RSI03785329
RSI00494600
RSI00493870
RSI00461558
RSI00460469
RSI01972423
RSI00461531



## Exhibit 3

Production Begin Bates
RSI00463359
RSI02103653
RSI02634743
RSI00493123
RSI03619036
RSI03780259
RSI00832220
RSI00828747
RSI00493681
RSI00907871
RSI00464587
RSI00344454
RSI00461933
RSI02102001
RSI03624066
RSI03785327
RSI02308281
RSI00493194
RSI00451952
RSI03554113
RSI01223931
RSI01128195
RSI01270828
RSI00992315
RSI03183502
RSI03619876
RSI03627929
RSI03624063
RSI03619697
RSI02695509
RSI03625628
RSI03616563
RSI03625343
RSI03618565
RSI00829936
RSI03643651
RSI03619346
RSI02971092
RSI03628026
RSI03622039
RSI02683185
RSI03616393
RSI03618461
RSI02971532
RSI02971296
RSI02971740

## Exhibit 3

Production Begin Bates
RSI03625171
RSI02972277
RSI03626311
RSI03625115
RSI02715157
RSI01986408
RSI03619876
RSI03624063
RSI03619697
RSI02443065
RSI02374671
RSI02280305
RSI01982690
RSI03618565
RSI03624606
RSI03643651
RSI03619346
RSI02971092
RSI03628026
RSI02010444
RSI02372451
RSI00492995
RSI03615189
RSI03622039
RSI02608693
RSI03616393
RSI03618461
RSI02971296
RSI01987999
RSI02213427
RSI03625171
RSI02972277
RSI03621327
RSI03626311
RSI02441925
RSI02001058
RSI03625115
RSI03622176
RSI02239766
RSI03800601
RSI00791594
RSI02046549
RSI02626680
RSI00759614
RSI00801492
RSI00348040



Exhibit 3

Production Begin Bates
RSI02190716
RSI03640515
RSI00796373